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HAROLD LEGGETT, Ph.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Certified Mail No.

Agency Interest No. 288
Activity No.: PER20070009

Mr. Kelly B. Serio
Vice President/Plant Manager
Formosa Plastics Corporation
P.O. Box 271
Baton Rouge, LA 70821-0271

RE: Prevention of Significant Deterioration (PSD) Permit, PSD-LA-560 (M-4)
Formosa Plastics Corp Louisiana - Baton Rouge Plant
Formosa Plastics Corp LA, Baton Rouge, East Baton Rouge Parish, Louisiana

Enclosed is your permit, PSD-LA-560 (M-4). Operation of the proposed project is not allowed until such time as the corresponding operating permit is issued.

Should you have any questions concerning the permit, contact L. Dugas at 225-219-3127.

Cheryl S. Nolan
Assistant Secretary

Date

CSN:LND

c: EPA Region VI

PUBLIC NOTICE
LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY (LDEQ)
FORMOSA PLASTICS CORPORATION LOUISIANA - BATON ROUGE PLANT, UTILITIES
UNIT
PROPOSED PART 70 AIR OPERATING PERMIT MODIFICATION AND
PREVENTION OF SIGNIFICANT DETERIORATION (PSD) PERMIT MODIFICATION

The LDEQ, Office of Environmental Services, is accepting written comments on a Part 70 Air Operating Permit Modification and a Prevention of Significant Deterioration (PSD) Permit Modification for Formosa Plastics Corporation Louisiana (FPC), PO Box 271, Baton Rouge, LA 70821-0271 for the Baton Rouge Plant, Utilities Unit. **The facility is located at the North end of Gulf States Rd, Baton Rouge, LA 70805, East Baton Rouge Parish.**

FPC requested the following:

- Correction to the permit expiration date from August 1, 2011 to September 12, 2011.
- Addition of a hydrochloric acid tank UT-505B, as an insignificant source. UT-505B will be constructed and operated similarly as UT-505, Formosa's existing Hydrochloric Acid Tank. As with UT-505, Formosa conservatively estimates the HCl emissions from UT-505B to be approximately 75 lb/yr. Even with two tanks emitting HCl, their total emissions is less than the Minimum Emissions Rate (MER) of 500 lbs/yr.
- Higher maximum hourly emission rates to account for operation of 212-Cogeneration Unit No. 3, EQT009, at conditions other than steady state (e.g., during start-ups, shutdowns, and/ or when operating at loads less than 25 MW). Annual permitted emissions rates will not change. The requested emissions are based, in part, on vendor data from the gas turbine manufacturer and LDEQ NOX RACT requirement at LAC 33:III.2201. The unit will be allowed to operate at maximum lb/hr emissions rates as follows.

Max Lb/Hr Emissions Rates for Cogeneration Unit No. 3
(Startups and Shutdowns and/or Loads \leq 25 MW)

	Gas Turbine No. 3 (Source ID 212A)	HRSG No. 3 (Source ID 212B)	Cogeneration Unit No. 3 (Source ID 212)
NOx	109.09 max lb/hr (at heat input of 320 MM BTU/hr)	12.20 max lb/hr (at heat input of 122 MM BTU/hr)	121.29 max lb/hr
CO	75.02 max lb/hr (at heat input of 170 MM BTU/hr)	10.69 max lb/hr (at heat input of 122 MM BTU/hr)	85.71 max lb/hr

- Replacement of one of two existing emergency fire pump engines (525 hp North Firewater Pump Engine) currently permitted as a General Condition XVII activity. The new pump engine has applicable federal requirements (40 CFR 63 Subpart ZZZZ and 40 CFR 60 Subpart IIII) and needs to be permitted as a point source. UCC has also requested to increase hours of operation from 215 hrs/yr to 450 hrs/yr.
- An increase in the hours of operation for the emergency fire pump engine (525 hp South Firewater Pump engine) from 215 hrs/yr to 450 hrs/yr. The pump is currently permitted as GCXVII activity.
- Replacement of two out of three cells from the existing cooling tower, Source ID 220, at the Utilities Unit.
- Removal of NESHAP 40 CFR 63 Subpart DDDDD requirements from the permit, specifically the Package Boilers B1 & B2 (EQT077 and EQT131). Sources that were subject to the vacated Boiler MACT may now be subject to case-by-case MACT under Clean Air Act Section 112(g) or 112(j). The EPA is in the process of determining if case-by-case MACT was triggered when the court vacated the Boiler MACT. If case-by-case MACT was triggered, FPC will be notified by letter. Sources affected by

case-by-case MACT will be required to file a permit application in accordance with 40 CFR part 63 subpart B requesting that the State issue a case-by-case MACT determination.

- Updating the emissions from the commonly vented gasoline tanks, EIQ 170, to reflect negligible emissions from benzene, toluene, xylene, n-hexane, and 2,2,4-trimethyl pentane.

- Removal from the current permit, the boilers, Emission Point EQT008, 205 – Package Boilers B and C. The boilers have been permanently removed from the site. Additionally, GRP008, Utility Unit Combustion CAP (Includes Boilers B&C Vent), will be removed from the permit as well.

Estimated emissions in tons per year are as follows:

Pollutant	Before	After	Change
PM ₁₀	39.38	36.06	-3.32
SO ₂	22.69	22.93	+0.24
NO _x	642.74	643.96	+1.22
CO	350.65	351.33	+0.68
VOC	35.53	35.74*	+0.21
Chlorine	3.42	3.65	+0.23

* Includes 11.32 TPY of LAC 33:III Chapter 51 Toxic Air Pollutants (TAPs):

A technical review of the working draft of the proposed permit was submitted to the facility representative and the LDEQ Surveillance Division. Any remarks received during the technical review will be addressed in the "Worksheet for Technical Review of Working Draft of Proposed Permit". All remarks received by LDEQ are included in the record that is available for public review.

Written comments, written requests for a public hearing or written requests for notification of the final decision regarding this permit action may be submitted to Ms. Soumaya Ghosn at LDEQ, Public Participation Group, P.O. Box 4313, Baton Rouge, LA 70821-4313. **Written comments and/or written requests must be received by 12:30 p.m., Thursday, May 8, 2008.** Written comments will be considered prior to a final permit decision.

If LDEQ finds a significant degree of public interest, a public hearing will be held. LDEQ will send notification of the final permit decision to the applicant and to each person who has submitted written comments or a written request for notification of the final decision.

The applications, proposed Part 70 air operating permit modification, prevention of significant deterioration (PSD) permit modification, and statement of basis are available for review at the LDEQ, Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, LA. Viewing hours are from 8:00 a.m. to 4:30 p.m., Monday through Friday (except holidays). **The available information can also be accessed electronically on the Electronic Document Management System (EDMS) on the DEQ public website at www.deq.louisiana.gov.**

An additional copy of this action may be reviewed at the East Baton Rouge Parish Library, Delmont Gardens Branch, 3351 Lorraine Street, Baton Rouge, LA 70805.

Inquiries or requests for additional information regarding this permit action should be directed to the Petrochemical Section, LDEQ, Air Permits Division, P.O. Box 4313, Baton Rouge, LA 70821-4313, phone (225) 219-3127.

Persons wishing to be included on the LDEQ permit public notice mailing list or for other public participation related questions should contact the Public Participation Group in writing at LDEQ, P.O. Box 4313, Baton Rouge, LA 70821-4313, by email at deqmaillistrequest@la.gov or contact the LDEQ Customer Service Center at (225) 219-LDEQ (219-5337).

Permit public notices including electronic access to the proposed permits and statement of basis can be viewed at the LDEQ permits public notice webpage at www.deq.louisiana.gov/apps/pubNotice/default.asp and general information related to the public participation in permitting activities can be viewed at www.deq.louisiana.gov/portal/tabid/2198/Default.aspx.

Alternatively, individuals may elect to receive the permit public notices via email by subscribing to the LDEQ permits public notice List Server at http://www.doe.louisiana.gov/oes/listservpage/ldeq_pn_listserv.htm.

All correspondence should specify AI Number 288, Permit Number 2915-V1 and Activity Number PER20070010 and PSD-LA-560 (M-4) and Activity Number PER20070009.

Scheduled Publication Date: April 4, 2008

BRIEFING SHEET

**Formosa Plastics Corporation Louisiana
Agency Interest No.: 288
Baton Rouge, East Baton Rouge Parish, Louisiana
PSD-LA-560(M-4)**

PURPOSE

Formosa Plastics Corporation (FPC) requests that existing PSD-LA-560 (M3) be updated to include max lb/hr emission rates of NO_x and CO for Turbine, 212-Cogeneration Unit No. 3, at conditions other than steady state (e.g., during start-ups, shutdowns, and/or when operating at loads \leq 25 MW). The requested emissions are based, in part, on vendor data from the gas turbine manufacturer and LDEQ NO_x RACT requirement at LAC 33:III.2201.

PSD-LA-560(M-3) reflected the removal of permanently shut down emissions units and the incorporation of updated specific condition language. PSD-LA-560(M-2), issued on March 7, 1997, allowed for the operation of a third combined-cycle gas turbine (Cogeneration Unit No. 3, Source ID 212). PSD-LA-560(M-4) incorporates and updates the requirements of PSD-LA-560(M-3), as applicable, and supersedes previous PSD permits, including PSD-LA-560, PSD-LA-560(M-1), PSD-LA-560(M-2), and PSD-LA-560(M3).

RECOMMENDATION

Approval of the proposed changes incorporated into PSD-LA-560(M-4) as detailed in the project description.

REVIEWING AGENCY

Louisiana Department of Environmental Quality, Office of Environmental Services, Air Permits Division.

PROJECT DESCRIPTION

PSD-LA-560(M-4) includes max lb/hr emission rates of NO_x and CO for Turbine, 212-Cogeneration Unit No. 3, at conditions other than steady state (e.g., during start-ups, shutdowns, and/or when operating at loads \leq 25 MW). The requested emissions are based, in part, on vendor data from the gas turbine manufacturer and LDEQ NO_x RACT requirement at LAC 33:III.2201.

PSD-LA-560(M-3) updated the requirements included in PSD-LA-560(M-2). This permit reflected the removal of permanently shut down emissions units and updated the specific conditions.

In PSD-LA-560(M-2), emission rates were included in Specific Condition No. 1 for the Oxychlorination Vent, Incinerator No. 1, Incinerator No. 2, South VCM Cracking Furnace, and North VCM Cracking Furnace (Source IDs 115, 165, 176, 169, and 174, respectively). These sources were permanently decommissioned with the shutdown of the Caustic Chlorine (CCN) Unit

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and VCM 1 Unit. Therefore, these sources were removed from PSD-LA-560 (M3). Since Specific Conditions No. 2, 4, and 6 in PSD-LA-560 (M-2) have been previously completed, language was added to these conditions in PSD-LA-560 (M3) clarifying that the requirements have been met. Additionally, Specific Condition No. 5 in PSD-LA-560(M-2) was removed from PSD-LA-560 (M3) since this requirement does not apply to the Cogeneration Unit No. 3 duct burner in accordance with 40 CFR 60 Subpart Db and EPA determinations.

PSD-LA-560(M-2) is incorporated into this permit except as noted herein. The operation of Cogeneration Unit No. 3 (Source ID 212) was permitted in PSD-LA-560(M-2). Emissions increases due to the previously permitted project in PSD-LA-560(M-2) were significant for nitrogen oxides (NO_x) and carbon monoxide (CO) and required Prevention of Significant Deterioration review. Estimated emissions for the operation of Cogeneration Unit No. 3, as permitted in PSD-LA-560(M-2), in tons per year, were as follows:

<u>Pollutant</u>	<u>Increase due To Project</u>	<u>PSD de Minimis</u>
PM ₁₀	6.07	15
SO ₂	1.58	40
NO _x	429.23	40
CO	125.02	100
VOC	6.43	40

TYPE OF REVIEW

PSD-LA-560(M4) does not include a proposed construction project. The permit includes max lb/hr emission rates of NO_x and CO for Turbine, 212-Cogeneration Unit No. 3, at conditions other than steady state (e.g., during start-ups, shutdowns, and/or when operating at loads \leq 25 MW). The requested emissions are based, in part, on vendor data from the gas turbine manufacturer and LDEQ NO_x RACT requirement at LAC 33:III.2201. The CO and NO_x annual TPY emissions determined in PSD-LA-560-M2 and M3 for Turbine, 212-Cogeneration Unit No. 3 are not changing.

PSD-LA-560(M-3) did not include a proposed construction project. The permit addressed removal of permanently shut down sources and updated specific condition language.

Prior to issuance of existing PSD-LA-560(M-2), NO_x and CO emissions were reviewed in accordance with PSD regulations since their emission rates were above their respective PSD significance levels for the operation of Cogeneration Unit No. 3. It was determined that control of NO_x emissions from the new turbine to a level of 9 ppm at optimization met the requirements of lowest

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achievable emission rate (LAER) technology and best available control technology (BACT). Because of the inverse relationship between carbon monoxide emissions and NO_x emissions in the normal combustion range, no additional controls was determined to be BACT for CO emissions.

BEST AVAILABLE CONTROL TECHNOLOGY

PSD-LA-560 (M-4) includes max lb/hr emissions of NO_x and CO from Turbine, 212-Cogeneration Unit No. 3, at conditions other than steady state (e.g., during start-ups, shutdowns, and/or when operating at loads \leq 25 MW). The requested emissions are based, in part, on vendor data from the gas turbine manufacturer and LDEQ NO_x RACT requirement at LAC 33:III.2201. The CO and NO_x annual TPY emissions determined in PSD-LA-560-M2 and M3 for Turbine, 212-Cogeneration Unit No. 3 are not changing. Emissions of criteria pollutants will not increase more than the PSD significance levels. BACT analysis is not required.

Max Lb/Hr Emissions Rates for Cogeneration Unit No. 3 (Startups and Shutdowns and/or Loads \leq 25 MW)			
	Gas Turbine No. 3 (Source ID 212A)	HRSNG No. 3 (Source ID 212B)	Cogeneration Unit No. 3 (Source ID 212)
NO_x	109.09 max lb/hr (at heat input of 320 MM BTU/hr)	12.20 max lb/hr (at heat input of 122 MM BTU/hr)	121.29 max lb/hr
CO	75.02 (max lb/hr) (at heat input of 170 MM BTU/hr)	10.69 max lb/hr (at heat input of 122 MM BTU/hr)	85.71 max lb/hr

The equipment is still subject to the current BACT which was determined and documented in Permit PSD-LA-560 (M-2), dated March 7, 1997, as follows:

The operation of Cogeneration Unit No. 3 (Source ID 212), as permitted in PSD-LA-560(M-2), required a BACT analysis. In PSD-LA-560 (M-2), control of NO_x emissions from the new turbine to a level of 9 ppmv at optimization was determined to meet the requirements of LAER and BACT. Because of the inverse relationship between CO emissions and NO_x emissions in the normal combustion range, no additional controls were determined to be BACT for CO emissions.

PSD-LA-560(M-3) did not include modification of existing equipment and did not require a BACT analysis.

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AIR QUALITY IMPACT ANALYSIS

Prevention of Significant Deterioration (PSD) regulations require an analysis of existing air quality for those pollutants emitted in significant amounts from a proposed major modification or new facility. The proposed changes incorporated into PSD-LA-560(M-4) do not include modifications to existing equipment. There are no significant increases in emissions resulting from the proposed changes in PSD-LA-560 (M-4); therefore, an analysis of the air quality impact due to changes is not required.

Prior to issuance of PSD-LA-560(M-2), screening dispersion modeling was conducted for CO and NO_x for the proposed operation of Cogeneration Unit No. 3 (Source ID 212). The screening dispersion modeling indicated maximum ground level concentrations of CO were below the preconstruction monitoring exemption levels and the ambient significance levels. No preconstruction monitoring or increment analysis or refined modeling was required for CO.

As a result of the permitted project included in PSD-LA-560(M-2), ambient concentrations of NO_x predicted by screening modeling were above the preconstruction monitoring exemption level of 14 ug/m³. Background NO_x levels, based on data from an existing LDEQ monitoring site and modeled receptors of the site, were calculated to be 20 ug/m³ for the annual period. Dispersion modeling indicated the impact of NO_x was below the National Ambient Air Quality Standards (NAAQS) and within the allowable increment consumption limits of this pollutant.

ADDITIONAL IMPACTS

Soils, vegetation, and visibility will not be adversely impacted by the requested changes incorporated into PSD-LA-560(M-4), nor will any Class I area be affected. These proposed changes will not result in any significant secondary growth effects.

As permitted in PSD-LA-560(M-2), soils, vegetation, and visibility were not adversely impacted by the previously approved and implemented changes in emissions, nor was any Class I area affected. The previously permitted project did not result in any significant secondary growth effects.

PROCESSING TIME

Application Dated:	May 22, 2007
Application Received:	May 29, 2007
Additional Information Dated:	August 29, 2007
Effective Completeness:	XXXXXX XX, 2008

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PUBLIC NOTICE

A notice requesting public comment on the proposed permit was published in *The Advocate*, Baton Rouge, Louisiana, on September. Copies of the public notice were also mailed on XXXX XX, 2008 to individuals who have requested to be placed on the mailing list maintained by the Office of Environmental Services. The proposed permit was also submitted to U.S. EPA Region VI.

PRELIMINARY DETERMINATION SUMMARY

**Formosa Plastics Corporation Louisiana
Agency Interest No.: 288
Baton Rouge, East Baton Rouge Parish, Louisiana
PSD-LA-560(M-4)**

I. APPLICANT

Formosa Plastics Corp LA
PO Box 271
Baton Rouge, LA 708210271

II. LOCATION

Formosa Plastics Corporation Louisiana (FPC) is located at Gulf States Road North, East Baton Rouge Parish, Baton Rouge, Louisiana. The facility is located in a heavy industrial area on the east bank of the Mississippi River. It is bordered on the north, east, and south by other chemical/petrochemical and oil refining facilities. Approximate UTM coordinates are 674.00 kilometers East and 3375.00 kilometers North, Zone 15.

III. PROJECT DESCRIPTION

PSD-LA-560, dated September 20, 1990, addressed the re-permitting of combustion sources in FPC's VCM I Unit (now permanently shutdown as discussed in PSD-LA-560(M-3)). According to the Preliminary Determination Summary of PSD-LA-560, a top-down BACT analysis was required for Gas Turbines No. 1 and No. 2 for carbon monoxide (CO), but not for nitrogen oxides (NO_x). As such, annual and hourly emission limitations only for CO were included for Gas Turbines No. 1 and No. 2. FPC netted out of NO_x PSD review by reducing NO_x emissions from Gas Turbine No. 1 and No. 2.

PSD-LA-560(M-1), granted March 2, 1995, authorized the construction of new Gas Turbine No. 3 with BACT requirements for NO_x and CO. This approval also required the retrofit of either existing Gas Turbine No.1 or existing Gas Turbine No. 2 with dry low NO_x control technology to offset new NO_x emissions from the proposed Gas Turbine No. 3. According to the Preliminary Determination Summary of PSD-LA-560(M-1), a NO_x BACT analysis was conducted for the new Gas Turbine No. 3, and 9 ppmv NO_x at optimization was determined to meet the BACT requirements. This BACT was included in the permit via the NO_x emission limits for Gas Turbine No. 3. Due to the inverse relationship between NO_x and CO emissions, no additional controls were determined to be BACT for CO emissions, and CO limits were also included for Gas Turbine No. 3. Additional NO_x and CO emission limitations were added for either Gas Turbine No.1 or No. 2 (but not both) due to the retrofit requirement imposed on one of the existing turbines. Therefore, in PSD-LA-560(M-1), the only sources with NO_x emission limitations were Gas Turbine No. 3 and either Gas Turbine No.1 or Gas Turbine No. 2.

Subsequent regulatory changes by the LDEQ and EPA (the Baton Rouge nonattainment

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area's CAA Section 182(f) NO_x exemption) resulted in the elimination of NO_x offset requirements. Therefore, PSD-LA-560(M-2), issued March 7, 1997, removed the requirement to retrofit either Gas Turbine No.1 or Gas Turbine No. 2 with dry low NO_x technology.

PSD-LA-560(M-3) incorporated and updated the requirements included in PSD-LA-560 (M-2). This permit addressed the removal of permanently shut down emission sources and updated specific condition language. PSD-LA-560(M-3) superseded the previous PSD permits, including PSD-LA-560, PSD-LA-560(M-1) and PSD-LA-560(M-2).

In PSD-LA-560(M-2), emission rates were included in Specific Condition No. 1 for the Oxychlorination Vent, Incinerator No. 1, Incinerator No. 2, South VCM Cracking Furnace, and North VCM Cracking Furnace (Source IDs 115, 165, 176, 169, and 174, respectively). These sources were permanently decommissioned with the shutdown of the Caustic Chlorine (CCN) Unit and VCM 1 Unit. Therefore, these sources were removed in PSD-LA-560(M-3).

Also, in PSD LA-560(M-3), since Specific Conditions No. 2, 4, and 6 in PSD-LA-560(M-2) had been previously completed, language was added to these conditions clarifying that the requirements had been met. Additionally, Specific Condition No. 5 in PSD-LA-560(M-2) was removed from the permit since this requirement did not apply to the Cogeneration Unit No. 3 duct burner in accordance with 40 CFR 60 Subpart Db and EPA determinations.

The operation of Cogeneration Unit No. 3 (Source ID 212) was permitted in PSD-LA-560(M-2). Emissions increases due to the previously permitted project in PSD-LA-560 (M-2) were significant for nitrogen oxides (NO_x) and carbon monoxide (CO) and required Prevention of Significant Deterioration review. Estimated emissions for the operation of Cogeneration Unit No. 3, as permitted in PSD-LA-560(M-2), in tons per year, were as follows:

<u>Pollutant</u>	<u>Increase due To Project</u>	<u>PSD de Minimis</u>
PM ₁₀	6.07	15
SO ₂	1.58	40
NO _x	429.23	40
CO	125.02	100
VOC	6.43	40

PSD-LA-560(M4) does not include a proposed construction project. The permit includes max lb/hr emission rates of NO_x and CO for Turbine, 212-Cogeneration Unit No. 3, at conditions other than steady state (e.g., during start-ups, shutdowns, and/or when operating at

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loads \leq 25 MW). The requested emissions are based, in part, on vendor data from the gas turbine manufacturer and LDEQ NO_x RACT requirement at LAC 33:III.2201.

IV. SOURCE IMPACT ANALYSIS

A proposed net increase in the emission rate of a regulated pollutant above de minimis levels for modified major sources requires review under PSD regulations, LAC 33:III.509. PSD permit reviews of proposed new or modified major stationary sources require the following analyses:

- A. A determination of the Best Available Control Technology (BACT);
- B. Analysis of the existing air quality and a determination of whether or not preconstruction or postconstruction monitoring will be required;
- C. An analysis of the source's impact on total air quality to ensure compliance with the National Ambient Air Quality Standards (NAAQS);
- D. An analysis of the PSD increment consumption;
- E. An analysis of the source related growth impacts;
- F. An analysis of source related impacts on soils, vegetation, and visibility;
- G. A Class I Area impact analysis; and
- H. An analysis of the impact of toxic compound emissions.

A. BEST AVAILABLE CONTROL TECHNOLOGY

Under current PSD regulations, an analysis of "top down" BACT is required for the control of each regulated pollutant emitted from a modified major source in excess of the specified significant emission rates. The top down approach to the BACT process involves determining the most stringent control technique available for a similar or identical source. If it can be shown that this level of control is infeasible based on technical, environmental, energy, and/or cost considerations, then it is rejected and the next most stringent level of control is determined and similarly evaluated. This process continues until a control level is arrived at which cannot be eliminated for any technical, environmental, or economic reason. A technically feasible control strategy is one that has been demonstrated to function efficiently on identical or similar processes.

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The proposed changes requested for PSD-LA-560(M-4) do not include modification of existing equipment and do not require a BACT analysis. The operation of Cogeneration Unit No. 3 (Source ID 212), as permitted in PSD-LA-560(M-2), was required to meet BACT since the NO_x and CO emissions were above PSD de minimis levels.

BACT analysis for NO_x

As permitted in PSD-LA-560 (M-2), control of NO_x emissions from the turbine to a level of 9 ppmv at optimization was determined to meet the requirements of lowest achievable emission rate (LAER) technology and best available control technology (BACT).

BACT analysis for CO

As permitted in PSD-LA-560 (M-2), due to the inverse relationship between CO emissions and NO_x emissions in the normal combustion range, no additional controls were determined to be BACT for CO emissions.

B. ANALYSIS OF EXISTING AIR QUALITY

PSD regulations require an analysis of existing air quality for those pollutants emitted in significant amounts resulting from a proposed modification or new facility. The proposed changes incorporated into PSD-LA-560(M-4) do not include modifications to existing equipment. There are no significant increases in emissions resulting from the proposed changes in PSD-LA-560(M-4).

In PSD-LA-560(M-2), nitrogen oxides (NO_x) and carbon monoxide (CO) were addressed due to the proposed addition of Cogeneration Unit No. 3 (Source ID 212). Modeling due to this previously permitted project alone, as discussed below, demonstrated that the maximum impacts of CO resulted in concentrations below the preconstruction monitoring exemption level for the 8-hour averaging time. Screening modeling for NO_x resulted in concentrations above the preconstruction monitoring exemption level of 14 ug/m³ for the annual averaging period. Therefore, air monitoring data from the nearest site was utilized for preconstruction monitoring requirements. This National Air Monitoring Station (NAMS) satisfies the requirements outlined in the PSD monitoring guidelines. These concentrations were also well below the NAAQS requirements.

PRELIMINARY DETERMINATION SUMMARY

**Formosa Plastics Corporation Louisiana
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C. NATIONAL AMBIENT AIR QUALITY STANDARDS (NAAQS) ANALYSIS

The proposed changes included in PSD-LA-560(M-4) do not require modeling since no projects resulting in modifications to the existing sources are included.

Refined modeling was not required for CO emissions as a result of the operation of Cogeneration Unit No. 3 (Source ID 212) permitted in PSD-LA-560(M-2). Refined modeling for NO_x emissions for this previously permitted project resulted in an annual concentration of 60 ug/m³. When added to the background concentration of 20 ug/m³, it remained below the 100 ug/m³ annual standard.

D. PSD INCREMENT ANALYSIS

The proposed changes included in PSD-LA-560(M-4) do not require a PSD increment analysis since there are no projects resulting in modifications to existing equipment.

As discussed in PSD-LA-560(M-2), modeling for NO_x increment consumption for the previously permitted project indicated an increment expansion. This was due to a general reduction of NO_x in the area inventory since the baseline date.

E. SOURCE RELATED GROWTH IMPACTS

The construction and operation of Cogeneration Unit No. 3 (Source ID 212), as permitted in PSD-LA-560(M-2), did not have any significant effect on residential growth or industrial/commercial development in the area of the facility. No significant net change in employment, population, or housing was associated with the previously permitted project. As a result, there were not any significant increases in pollutant emissions indirectly associated with the previously permitted project.

F. SOILS, VEGETATION, AND VISIBILITY IMPACTS

There will be no significant impact on area soils, vegetation, or visibility.

G. CLASS I AREA IMPACTS

Breton National Wildlife Area, the nearest Class I area, is over 100 kilometers from the site, precluding any significant impact.

PRELIMINARY DETERMINATION SUMMARY

Formosa Plastics Corporation Louisiana

Agency Interest No.: 288

Baton Rouge, East Baton Rouge Parish, Louisiana

PSD-LA-560(M-4)

H. TOXIC IMPACT

The requested changes included in PSD-LA-560(M-4) do not include any proposed modifications to existing sources. As permitted in PSD-LA-560(M-2), emissions of toxic air pollutants associated with the combustion of natural gas increased slightly as a result of the operation of Cogeneration Unit No. 3 (Source ID 212). However, combustion of natural gas currently is exempted from LAC 33:III.Chapter 51 requirements under the virgin fossil fuel provisions. The increase in impact was estimated to be insignificant. Technology for the control of NO_x was chosen in part to minimize introduction of additional toxic compounds.

V. CONCLUSION

The Air Permits Division has made a preliminary determination to approve the proposed updates to PSD-LA-560(M-3) for Formosa Plastics Corporation Louisiana, Baton Rouge, East Baton Rouge Parish, Louisiana, subject to the attached specific and general conditions. In the event of a discrepancy in the provisions found in the application and those in this Preliminary Determination Summary, the Preliminary Determination Summary shall prevail.

SPECIFIC CONDITIONS

Formosa Plastics Corporation Louisiana
Agency Interest No.: 288
Baton Rouge, East Baton Rouge Parish, Louisiana
PSD-LA-560(M-4)

1. The permittee is authorized to operate in conformity with the specifications submitted to the Louisiana Department of Environmental Quality (LDEQ) and subject to the following emission limitations and other specified conditions. Specifications submitted to LDEQ are contained in the original application dated May 22, 2007 requesting a modification to the TV permit and the PSD permit, and received by LDEQ on May 29, 2007. Additional information dated August 29, October 12, 31, and November 1, 2007 was also received.

MAXIMUM ALLOWABLE EMISSIONS RATES

ID	Description	NO _x			CO	
		ppmv	lb/hr	TPY	lb/hr	TPY
166	Gas Turbine No. 1 HRSG No. 1	-	-	253.6	70.0	95.5
167	Gas Turbine No. 2 HRSG No. 2	-	-	253.6	70.0	95.5
212	Gas Turbine No. 3 HRSG No. 3 (At loads greater than 25 MW)	9*	75.0	107.1	70.0	113.0
	Gas Turbine No. 3 HRSG No. 3 (during start-ups, shutdowns, and/or when operating at loads <= 25 MW)	-	121.29		85.71	

* At turbine optimization.

2. Permittee shall demonstrate compliance with permitted emission limits by performing stack tests using methods found in 40 CFR 60, Appendix A, for the new turbine, Emission Point 212, as follows:
 - A) CO by Method 10 - Determination of Carbon Monoxide Emissions from Stationary Sources. This requirement was previously completed and the results submitted to LDEQ on December 23, 1996. No additional test(s) are required for this permit.
 - B) NO_x by Method 20 - Determination of Nitrogen Oxides, Sulfur Dioxide, and Oxygen Emissions From Stationary Gas Turbines; or other methods suitable to the Office of Environmental Assessment, Air Quality Assessment Division. Permittee shall demonstrate compliance with a 9 ppmv NO_x emission limit (on a dry basis corrected to 15% O₂) at

SPECIFIC CONDITIONS

**Formosa Plastics Corporation Louisiana
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Baton Rouge, East Baton Rouge Parish, Louisiana
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optimization for the new turbine, Turbine No. 3. This requirement was previously completed and the results submitted to LDEQ on December 23, 1996. No additional test(s) are required for this permit.

3. Permittee shall comply with all applicable provisions of New Source Performance Standards, 40 CFR 60, Subpart Db-Standards of Performance for Industrial-Commercial-Institutional Steam Generating Units, for the duct burner, Emission Point 212.
4. Permittee shall demonstrate initial compliance with the NO_x emission limits of PSD-LA-560 (M-2) by stack testing the duct burner, Emission Point 212, as specified in New Source Performance Standards, 40 CFR 60, Subpart Db, Section 60.46b(f). This requirement was previously completed and the results submitted to LDEQ on December 23, 1996. No additional test(s) are required for this permit.
5. Permittee shall demonstrate compliance with permitted CO emission limits of PSD-LA-560 (M-2) by stack testing the duct burner, Emission Point 212, using methods found in 40 CFR 60, Appendix A, Method 10-Determination of Carbon Monoxide Emissions From Stationary Sources. This requirement was previously completed and the results submitted to LDEQ on December 23, 1996. No additional test(s) are required for this permit.
6. Permittee shall operate the duct burners, Emission Points 166, 167, and 212, with sweet natural gas only.
7. Permittee shall comply with all applicable provisions of New Source Performance Standards, 40 CFR 60, Subpart GG - Standards of Performance for Stationary Gas Turbines, in the operation of the turbines, Emission Points 166, 167, and 212.

40 CFR PART 70 GENERAL CONDITIONS

- A. The term of this permit shall be five (5) years from date of issuance. An application for a renewal of this 40 CFR Part 70 permit shall be submitted to the administrative authority no later than six months prior to the permit expiration date. Should a complete permit application not be submitted six months prior to the permit expiration date, a facility's right to operate is terminated pursuant to 40 CFR Section 70.7(c)(ii). Operation may continue under the conditions of this permit during the period of the review of the application for renewal. [LAC 33:III.507.E.1, E.3, E.4, reference 40 CFR 70.6(a)(2)]
- B. The conditions of this permit are severable; and if any provision of this permit or the application of any provision of this permit to any circumstance is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [Reference 40 CFR 70.6(a)(5)]
- C. Permittee shall comply with all conditions of the 40 CFR Part 70 permit. Any permit noncompliance constitutes a violation of the Clean Air Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. This permit may be modified, revoked, reopened and reissued, or terminated for cause. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [LAC 33:III.507.B.2, reference 40 CFR 70.6(a)(6)(i) & (iii)]
- D. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [Reference 40 CFR 70.6(a)(6)(ii)]
- E. This permit does not convey any property rights of any sort, or an exclusive privilege. [Reference 40 CFR 70.6(a)(6)(iv)]
- F. The permittee shall furnish to the permitting authority, within a reasonable time, any information that the permitting authority may request in writing to determine whether cause exists for modifying, revoking, and reissuing, or terminating the permit or to determine compliance with the permit. Upon request, the permittee shall also furnish to the permitting authority copies of records required to be kept by the permit or, for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. A claim of confidentiality does not relieve the permittee of the requirement to provide the information. [LAC 33:III.507.B.2, 517.F, reference 40 CFR 70.6(a)(6)(v)]
- G. Permittee shall pay fees in accordance with LAC 33:III.Chapter 2 and 40 CFR Section 70.6(a)(7). [LAC 33:III.501.C.2, reference 40 CFR 70.6(a)(7)]

40 CFR PART 70 GENERAL CONDITIONS

- H. Upon presentation of credentials and other documents as may be required by law, the permittee shall allow the permitting authority or authorized representative to perform the following:
1. enter upon the permittee's premises where a 40 CFR Part 70 source is located or emission-related activity is conducted, or where records must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(i)];
 2. have access to and copy, at reasonable times, any records that must be kept under the conditions of the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(ii)];
 3. inspect at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iii)]; and
 4. as authorized by the Clean Air Act, sample or monitor at reasonable times substances or parameters for the purpose of assuring compliance with the permit or applicable requirements. [LAC 33:III.507.H.2, reference 40 CFR 70.6(c)(2)(iv)]
- I. All required monitoring data and supporting information shall be kept available for inspection at the facility or alternate location approved by the agency for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Supporting information includes calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and all reports required by the permit.
[Reference 40 CFR 70.6(a)(3)(ii)(B)]
- J. Records of required monitoring shall include the following:
1. the date, place as defined in the permit, and time of sampling or measurements;
 2. the date(s) analyses were performed;
 3. the company or entity that performed the analyses;
 4. the analytical techniques or methods used;
 5. the results of such analyses; and
 6. the operating conditions as existing at the time of sampling or measurement.
- [Reference 40 CFR 70.6(a)(3)(ii)(A)]
- K. Permittee shall submit at least semiannually, reports of any required monitoring, clearly identifying all instances of deviations from permitted monitoring requirements, certified by a responsible company official. For previously reported deviations, in lieu of attaching the individual deviation reports, the semiannual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The semiannual reports shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding period encompassing July through December and September 30 for the preceding period encompassing January through June. Any quarterly deviation report required to be submitted by March 31 or September 30 in accordance with Part 70 General Condition R may be consolidated with the semi-annual reports required by this general condition as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. [LAC 33:III.507.H, reference 40 CFR 70.6(a)(3)(iii)(A)]
- L. The permittee shall submit at least semiannual reports on the status of compliance pursuant to 40 CFR Section 70.5 (c) (8) and a progress report on any applicable schedule of compliance pursuant to 40 CFR Section 70.6 (c) (4). [LAC 33:III.507.H.1, reference 40 CFR 70.6(c)(4)]
- M. Compliance certifications per LAC 33:III.507.H.5 shall be submitted to the Administrator as well as the permitting authority. For previously reported compliance deviations, in lieu of attaching the

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individual deviation reports, the annual report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The compliance certifications shall be submitted to the Office of Environmental Compliance, Enforcement Division by March 31 for the preceding calendar year. [LAC 33:III.507.H.5, reference 40 CFR 70.6(c)(5)(iv)]

- N. If the permittee seeks to reserve a claim of an affirmative defense as provided in LAC 33:III.507.J.2, the permittee shall, in addition to any emergency or upset provisions in any applicable regulation, notify the permitting authority within 2 working days of the time when emission limitations were exceeded due to the occurrence of an upset. In the event of an upset, as defined under LAC 33:III.507.J, which results in excess emissions, the permittee shall demonstrate through properly signed, contemporaneous operating logs, or other relevant evidence that: 1) an emergency occurred and the cause was identified; 2) the permitted facility was being operated properly at the time; and 3) during the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standard or requirement of the permit. [LAC 33:III.507.J.2, reference 40 CFR 70.6(g)(3)(iv) & (i-iii)]
- O. Permittee shall maintain emissions at a level less than or equal to that provided for under the allowances that the 40 CFR Part 70 source lawfully holds under Title IV of the Clean Air Act or the regulations promulgated thereunder. No permit revision shall be required for increases in emissions that are authorized by allowances acquired pursuant to the acid rain program, provided that such increases do not require a permit revision under any other applicable requirement. No limit shall be placed on the number of allowances held by the source. The source may not, however, use allowances as a defense to noncompliance with any other applicable requirement. Any such allowance shall be accounted for according to the procedures established in regulations promulgated under Title IV of the Clean Air Act. [Reference 40 CFR 70.6(a)(4)]
- P. Any permit issued pursuant to 40 CFR Part 70 may be subject to reopening prior to the expiration of the permit for any of the conditions specified in 40 CFR Section 70.7(f) or LAC 33:III.529. [LAC 33:III.529.A-B, reference 40 CFR 70.7(f)]
- Q. Permittee may request an administrative amendment to the permit to incorporate test results from compliance testing if the following criteria are met:
1. the changes are a result of tests performed upon start-up of newly constructed, installed, or modified equipment or operations;
 2. increases in permitted emissions will not exceed five tons per year for any regulated pollutant;
 3. increases in permitted emissions of Louisiana toxic air pollutants or of federal hazardous air pollutants would not constitute a modification under LAC 33:III. Chapter 51 or under Section 112 (g) of the Clean Air Act;
 4. changes in emissions would not require new source review for prevention of significant deterioration or nonattainment and would not trigger the applicability of any federally applicable requirement;
 5. changes in emissions would not qualify as a significant modification; and
 6. the request is submitted no later than 12 months after commencing operation. [LAC 33:III.523.A, reference 40 CFR 70.7(d)]
- R. Permittee shall submit prompt reports of all permit deviations as specified below to the Office of Environmental Compliance, Enforcement Division. All such reports shall be certified by a responsible

40 CFR PART 70 GENERAL CONDITIONS

official in accordance with 40 CFR 70.5(d).

1. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
2. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
3. A written report shall be submitted quarterly to address all permit deviations not included in paragraphs 1 or 2 above. Unless required by an applicable reporting requirement, a written report is not required during periods in which there is no deviation. The quarterly deviation reports submitted on March 31 and September 30 may be consolidated with the semi-annual reports required by Part 70 General Condition K as long as the report clearly indicates this and all required information is included and clearly delineated in the consolidated report. For previously reported permit deviations, in lieu of attaching the individual deviation reports, the quarterly report may clearly reference the communication(s)/correspondence(s) constituting the prior report, including the date the prior report was submitted. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any permit deviations occurring during the corresponding specified calendar quarter:
 - a. Report by June 30 to cover January through March
 - b. Report by September 30 to cover April through June
 - c. Report by December 31 to cover July through September
 - d. Report by March 31 to cover October through December
4. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided such reports are certified in accordance with 40 CFR 70.5(d) and contain all information relevant to the permit deviation. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107. [Reference 40 CFR 70.6(a)(3)(iii)(B)]

S. Permittee shall continue to comply with applicable requirements on a timely basis, and will meet on a timely basis applicable requirements that become effective during the permit term. [Reference 40 CFR 70.5(c)(8)(iii)]

T. The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for Motor Vehicle Air Conditioners (MVACs) in Subpart B:

1. Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to 40 CFR 82.156;
2. Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158;
3. Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161;
4. Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with recordkeeping requirements pursuant to 40 CFR 82.166. ("MVAC-like appliance" as

40 CFR PART 70 GENERAL CONDITIONS

defined at 40 CFR 82.152);

5. Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to 40 CFR 82.156; and
6. Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to 40 CFR 82.166. [Reference 40 CFR 82, Subpart F]

- U. If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air Conditioners.

The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant. [Reference 40 CFR 82, Subpart B]

- V. Data availability for continuous monitoring or monitoring to collect data at specific intervals: Except for monitoring malfunctions, associated repairs, and required quality assurance or control activities (including calibration checks and required zero and span adjustments), the permittee shall conduct all monitoring in continuous operation (or shall collect data at all required intervals) at all times that the emissions unit is operating. For purposes of reporting monitoring deviations under Part 70 General Conditions K and R, and unless otherwise provided for in the Specific Requirements (or Table 3) of this permit, the minimum degree of data availability shall be at least 90% (based on a monthly average) of the operating time of the emissions unit or activity being monitored. This condition does not apply to Leak Detection and Repair (LDAR) programs for fugitive emissions (e.g., 40 CFR 60 Subpart VV, 40 CFR 63 Subpart H).

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- I. This permit is issued on the basis of the emissions reported in the application for approval of emissions and in no way guarantees that the design scheme presented will be capable of controlling the emissions to the type and quantities stated. Failure to install, properly operate and/or maintain all proposed control measures and/or equipment as specified in the application and supplemental information shall be considered a violation of the permit and LAC 33:III.501. If the emissions are determined to be greater than those allowed by the permit (e.g. during the shakedown period for new or modified equipment) or if proposed control measures and/or equipment are not installed or do not perform according to design efficiency, an application to modify the permit must be submitted. All terms and conditions of this permit shall remain in effect unless and until revised by the permitting authority.
- II. The permittee is subject to all applicable provisions of the Louisiana Air Quality Regulations. Violation of the terms and conditions of the permit constitutes a violation of these regulations.
- III. The Emission Rates for Criteria Pollutants, Emission Rates for TAP/HAP & Other Pollutants, and Specific Requirements sections or, where included, Emission Inventory Questionnaire sheets establish the emission limitations and are a part of the permit. Any operating limitations are noted in the Specific Requirements or, where included, Tables 2 and 3 of the permit. The synopsis is based on the application and Emission Inventory Questionnaire dated May 22, 2007, along with supplemental information dated August 29, September 19, October 12, 31, and November 1, 2007.
- IV. This permit shall become invalid, for the sources not constructed, if:
 - A. Construction is not commenced, or binding agreements or contractual obligations to undertake a program of construction of the project are not entered into, within two (2) years (18 months for PSD permits) after issuance of this permit, or;
 - B. If construction is discontinued for a period of two (2) years (18 months for PSD permits) or more.

The administrative authority may extend this time period upon a satisfactory showing that an extension is justified.

This provision does not apply to the time period between construction of the approved phases of a phased construction project. However, each phase must commence construction within two (2) years (18 months for PSD permits) of its projected and approved commencement date.
- V. The permittee shall submit semiannual reports of progress outlining the status of construction, noting any design changes, modifications or alterations in the construction schedule which have or may have an effect on the emission rates or ambient air quality levels. These reports shall continue to be submitted until such time as construction is certified as being complete. Furthermore, for any significant change in the design, prior approval shall be obtained from the Office of Environmental Services, Air Permits Division.
- VI. The permittee shall notify the Department of Environmental Quality, Office of Environmental Services, Air Permits Division within ten (10) calendar days from the date that construction is certified as complete and the estimated date of start-up of operation. The appropriate Regional Office shall also be so notified within the same time frame.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

- VII. Any emissions testing performed for purposes of demonstrating compliance with the limitations set forth in paragraph III shall be conducted in accordance with the methods described in the Specific Conditions and, where included, Tables 1, 2, 3, 4, and 5 of this permit. Any deviation from or modification of the methods used for testing shall have prior approval from the Office of Environmental Assessment, Air Quality Assessment Division.
- VIII. The emission testing described in paragraph VII above, or established in the specific conditions of this permit, shall be conducted within sixty (60) days after achieving normal production rate or after the end of the shakedown period, but in no event later than 180 days after initial start-up (or restart-up after modification). The Office of Environmental Assessment, Air Quality Assessment Division shall be notified at least (30) days prior to testing and shall be given the opportunity to conduct a pretest meeting and observe the emission testing. The test results shall be submitted to the Air Quality Assessment Division within sixty (60) days after the complete testing. As required by LAC 33:III.913, the permittee shall provide necessary sampling ports in stacks or ducts and such other safe and proper sampling and testing facilities for proper determination of the emission limits.
- IX. The permittee shall, within 180 days after start-up and shakedown of each project or unit, report to the Office of Environmental Compliance, Enforcement Division any significant difference in operating emission rates as compared to those limitations specified in paragraph III. This report shall also include, but not be limited to, malfunctions and upsets. A permit modification shall be submitted, if necessary, as required in Condition I.
- X. The permittee shall retain records of all information resulting from monitoring activities and information indicating operating parameters as specified in the specific conditions of this permit for a minimum of at least five (5) years.
- XI. If for any reason the permittee does not comply with, or will not be able to comply with, the emission limitations specified in this permit, the permittee shall provide the Office of Environmental Compliance, Enforcement Division with a written report as specified below.
- A. A written report shall be submitted within 7 days of any emission in excess of permit requirements by an amount greater than the Reportable Quantity established for that pollutant in LAC 33.I.Chapter 39.
- B. A written report shall be submitted within 7 days of the initial occurrence of any emission in excess of permit requirements, regardless of the amount, where such emission occurs over a period of seven days or longer.
- C. A written report shall be submitted quarterly to address all emission limitation exceedances not included in paragraphs A or B above. The schedule for submittal of quarterly reports shall be no later than the dates specified below for any emission limitation exceedances occurring during the corresponding specified calendar quarter:
1. Report by June 30 to cover January through March
 2. Report by September 30 to cover April through June
 3. Report by December 31 to cover July through September
 4. Report by March 31 to cover October through December
- D. Each report submitted in accordance with this condition shall contain the following

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

information:

1. Description of noncomplying emission(s);
2. Cause of noncompliance;
3. Anticipated time the noncompliance is expected to continue, or if corrected, the duration of the period of noncompliance;
4. Steps taken by the permittee to reduce and eliminate the noncomplying emissions; and
5. Steps taken by the permittee to prevent recurrences of the noncomplying emissions.

E. Any written report submitted in advance of the timeframes specified above, in accordance with an applicable regulation, may serve to meet the reporting requirements of this condition provided all information specified above is included. For Part 70 sources, reports submitted in accordance with Part 70 General Condition R shall serve to meet the requirements of this condition provided all specified information is included. Reporting under this condition does not relieve the permittee from the reporting requirements of any applicable regulation, including LAC 33.I.Chapter 39, LAC 33.III.Chapter 9, and LAC 33.III.5107.

XII. Permittee shall allow the authorized officers and employees of the Department of Environmental Quality, at all reasonable times and upon presentation of identification, to:

- A. Enter upon the permittee's premises where regulated facilities are located, regulated activities are conducted or where records required under this permit are kept;
- B. Have access to and copy any records that are required to be kept under the terms and conditions of this permit, the Louisiana Air Quality Regulations, or the Act;
- C. Inspect any facilities, equipment (including monitoring methods and an operation and maintenance inspection), or operations regulated under this permit; and
- D. Sample or monitor, for the purpose of assuring compliance with this permit or as otherwise authorized by the Act or regulations adopted thereunder, any substances or parameters at any location.

XIII. If samples are taken under Section XII.D. above, the officer or employee obtaining such samples shall give the owner, operator or agent in charge a receipt describing the sample obtained. If requested prior to leaving the premises, a portion of each sample equal in volume or weight to the portion retained shall be given to the owner, operator or agent in charge. If an analysis is made of such samples, a copy of the analysis shall be furnished promptly to the owner, operator or agency in charge.

XIV. The permittee shall allow authorized officers and employees of the Department of Environmental Quality, upon presentation of identification, to enter upon the permittee's premises to investigate potential or alleged violations of the Act or the rules and regulations adopted thereunder. In such investigations, the permittee shall be notified at the time entrance is requested of the nature of the suspected violation. Inspections under this subsection shall be limited to the aspects of alleged violations. However, this shall not in any way preclude prosecution of all violations found.

XV. The permittee shall comply with the reporting requirements specified under LAC 33:III.919 as well as notification requirements specified under LAC 33:III.927.

**LOUISIANA AIR EMISSION PERMIT
GENERAL CONDITIONS**

XVI. In the event of any change in ownership of the source described in this permit, the permittee and the succeeding owner shall notify the Office of Environmental Services in accordance with LAC 33:I.Chapter 19.Facility Name and Ownership/Operator Changes Process.

XVII. Very small emissions to the air resulting from routine operations, that are predictable, expected, periodic, and quantifiable and that are submitted by the permitted facility and approved by the Air Permits Division are considered authorized discharges. Approved activities are noted in the General Condition XVII Activities List of this permit. To be approved as an authorized discharge, these very small releases must:

1. Generally be less than 5 TPY
2. Be less than the minimum emission rate (MER)
3. Be scheduled daily, weekly, monthly, etc., or
4. Be necessary prior to plant startup or after shutdown [line or compressor pressuring/depressuring for example]

These releases are not included in the permit totals because they are small and will have an insignificant impact on air quality. This general condition does not authorize the maintenance of a nuisance, or a danger to public health and safety. The permitted facility must comply with all applicable requirements, including release reporting under LAC 33:I.3901.

XVIII. Provisions of this permit may be appealed in writing pursuant to La. R.S. 30:2024(A) within 30 days from receipt of the permit. Only those provisions specifically appealed will be suspended by a request for hearing, unless the secretary or the assistant secretary elects to suspend other provisions as well. Construction cannot proceed except as specifically approved by the secretary or assistant secretary. A request for hearing must be sent to the following:

Attention: Office of the Secretary, Legal Services Division
La. Dept. of Environmental Quality
Post Office Box 4302
Baton Rouge, Louisiana 70821-4302

XIX. For Part 70 sources, certain Part 70 general conditions may duplicate or conflict with state general conditions. To the extent that any Part 70 conditions conflict with state general conditions, then the Part 70 general conditions control. To the extent that any Part 70 general conditions duplicate any state general conditions, then such state and Part 70 provisions will be enforced as if there is only one condition rather than two conditions.

TABLE I
BACT COST SUMMARY

Formosa Plastics Corporation Louisiana
Agency Interest No.: 288
Baton Rouge, East Baton Rouge Parish, Louisiana
PSD-LA-560(M-4)

Control Alternative for NO _x and CO emissions		Availability / Feasibility	Negative Impacts (a)	Control Efficiency	Emissions Reduction (TPY)	Annualized Cost (\$)	Cost Effectiveness (\$/Ton)	Notes
NO _x	Description of Control	NR ¹	NR ¹	NR ¹	NR ¹	NR ¹	NR ¹	NR ¹
CO	Description of Control	NR ¹	NR ¹	NR ¹	NR ¹	NR ¹	NR ¹	NR ¹
Notes: a) Negative impacts: 1) economic, 2) environmental, 3) energy, 4) safety b) Technically infeasible, economic analysis was not performed								

¹ Since this data was not required for the BACT analysis for operation of Cogeneration Unit No. 3 (Source ID 212) included in PSD-LA-560 (M-2), it is not provided in this permit. A BACT analysis for PSD-LA-560 (M-3) and PSD-LA-560 (M4) was not required since the proposed changes incorporated into PSD-LA-560 (M-3) and PSD-LA-560 (M4) did not include modifications to existing sources.

TABLE II
AIR QUALITY ANALYSIS SUMMARY

Formosa Plastics Corporation Louisiana
Agency Interest No.: 288
Baton Rouge, East Baton Rouge Parish, Louisiana
PSD-LA-560(M-4)

Pollutant	Averaging Period	Preliminary Screening Conc. ($\mu\text{g}/\text{m}^3$)	Significant Monitoring Conc. ($\mu\text{g}/\text{m}^3$)	Current Monitored Conc. ($\mu\text{g}/\text{m}^3$)	Level of Significant Impact ($\mu\text{g}/\text{m}^3$)	Maximum Modeled Conc. ($\mu\text{g}/\text{m}^3$)	Modeled + Background Conc. ($\mu\text{g}/\text{m}^3$)	National Ambient Air Quality Standard ($\mu\text{g}/\text{m}^3$)	Modeled PSD Increment Consumption ($\mu\text{g}/\text{m}^3$)	Allowable Class II PSD Increment ($\mu\text{g}/\text{m}^3$)
Nitrogen Dioxide ¹	Annual	NR ¹	14	NR ¹	1	NR ¹	NR ¹	100	NR ¹	25
CO ¹	1-hour	NR ¹	-	NR ¹	2000	NR ¹	NR ¹	40,000	NR ¹	-
	8-hour	NR ¹	575	NR ¹	500	NR ¹	NR ¹	10,000	NR ¹	-
NR = Not Required										

¹ This information was not required for PSD-LA-560 (M-3) and PSD-LA-560 (M4) since the proposed changes incorporated into PSD-LA-560 (M-3) and PSD-LA-560 (M4) did not include modifications to existing sources.